

MEMORANDUM

Cal/EPA



CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD CENTRAL VALLEY REGION

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Pete Wilson, Governor

TO: Frank Piccola
CALIFED

FROM: Jerry Bruns
Standards, Policies and Special Studies

AXNS

DATE: 29 July 1997

SIGNATURE: Jerry Bruns

SUBJECT: *Water Quality Impacts Technical Report*

I have completed a quick review of your draft report. It is difficult to evaluate potential impacts because the proposed actions are so general. As you have pointed out in your report, the specific details on how an action is implemented will determine whether there are potential adverse environmental impacts. Following are some preliminary comments.

1. Many of the actions involve use of dredged material to improve the Delta ecosystem, including constructing and restoring wetlands, restoring riparian habitat, and repairing levees. As the report points out, these activities have the potential to cause adverse impacts depending on the method of construction and the source of the dredged material. We are concerned about the use of contaminated sediment and the use of saline material in the Delta. Care needs to be taken in the selection and construction of wetland habitats. Some areas, for example, when converted into a wetland may promote mercury uptake in aquatic systems to levels that are not beneficial. I.TMS has developed criteria for dredged material reuse in the Bay. A similar effort is needed in the Delta to assure that adverse impacts are minimized. The Regional Board would like to participate in efforts to develop criteria for dredged material handling and reuse. This effort should begin immediately to assure that project implementation is not delayed while needed studies are completed.
2. The action calling for reduction of contaminants in agricultural runoff is too general to evaluate. The potential impacts depend on the specific practices that are implemented to achieve this reduction. In selecting actions for implementation, care needs to be taken to avoid implementing actions that decrease the concentration of one contaminant but inadvertently increase the concentration of another. One action that is frequently discussed is the reduction of surface runoff to reduce pesticide loads entering the rivers. This action would reduce the concentration of pesticides in the water but increase the concentration of selenium and salts.
3. One of the actions calls for creating seasonal wetlands by flooding agricultural lands for several months in winter and early spring. Studies need to be done to verify that pesticide residues do not cause adverse impacts on the seasonal wetlands.

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Technical Report

Page 2

4. The descriptions of actions calling for reductions of metals discharged from mines are a little confusing. Cache Creek is discussed under the Delta and the Sacramento River. Mercury should be included in the discussion of the Sacramento River. There are mercury sources in this watershed. The mines in the Cache Creek watershed, Manzanita, Albot and others, are sources of mercury. Mt. Diablo Mine, on Marsh Creek is a source of mercury to the Delta. These three mines are not significant sources of copper, zinc or cadmium. What is meant by the statement on Page 3-41 that metals might decay in the system upstream of the Delta?

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In conclusion, the potential impacts of the various alternatives will be easier to evaluate when specific actions are more fully described. We would like to participate in the CALFED process that determines the specific actions related to water quality that will be implemented to achieve CALFED goals. Please call me at (916)255-3093 if you have any questions.

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